

II. REMARKS

General

Claims 1-23 are pending in this application. Claims 24-26 are canceled without prejudice.

The outstanding issues raised by the OA are as follows:

- Claims 24-26 stand objected to over informalities. OA p.2.
- Claims 1-26 stand rejected under 35 U.S.C. 102(e) over U.S. Patent Application Publication No. 2003/0194199 (hereinafter *Roth*). OA pp. 2-5.

Claim Objections

Claims 24-26 stand objected to over informalities. OA p.2. Applicant has canceled claims 24-26, rendering the objection moot.

Claim Rejections - 35 USC § 102

Claims 1-26 stand rejected under 35 U.S.C. 102(e) over U.S. Patent Application Publication No. 2003/0194199 (hereinafter *Roth*). OA pp. 2-5. It is well settled that “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicant hereby traverses the rejection.

Claims 1, 12, 17, and 23 have been amended to further clarify the distinction over *Roth*. In particular, applicant submits that *Roth* does not disclose sending a user ID and a program ID to a service provider to cause a marketing content to be sent to the DVR where the DVR will then create a modified marketing and display the television program with the modified

marketing. Applicants response is set forth below.

Independent Claim 1

Claim 1 recites “a television program.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraphs [0047]-[0048] teach these limitations. OA p.2. Though it is difficult to tell from the OA, it appears the Examiner is interpreting *Roth*’s television broadcast signal as meeting the claim’s “television program.” Applicant respectfully disagrees with this interpretation, noting that a “broadcast signal” is not a “program.” Hence, *Roth* does not teach “a television program,” as set forth in the claims.

Claim 1 also recites “a user ID and a program ID.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations stating “determining the commercial that specific television sets within its region or governing TV set in the region.” OA p.2. Applicant notes the cited portions of *Roth* are silent as to both a user ID and a program ID. Hence, *Roth* fails to teach “a user ID and a program ID,” as set forth in the claim.

Claim 1 also recites “sending a user ID and a program ID to the service provider.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s teachings of a local broadcasting station or a national broadcaster—embodied by *Roth* as upstream system 60 (*Roth* para. [0046])—as meeting the claim’s limitations of “a service provider.” See OA p.2. It also appears that the Examiner is interpreting *Roth*’s television broadcast signal as meeting the claim’s user ID and program ID, with which Applicant disagrees, as discussed above. Applicant notes that *Roth* is silent sending its television broadcast signal to its upstream system 60, rather, *Roth* teaches upstream system 60 sends the television broadcast signal to downstream converter 80. Hence, even when using the Examiner’s interpretation of *Roth*, the cited art fails to teach the limitations of “sending a user ID and a program ID to the service provider,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim.
Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 2

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 2 also recites “determining whether a message indicating that no local marketing content exists for the television program has been received.” The Examiner alleges *Roth* paragraph [0046] teaches these limitations, yet the Examiner does not state what part of *Roth* is being interpreted as meeting the claim’s “message.” See OA p.3. Applicant notes the cited portions of *Roth* are silent to a “message,” much less “a message indicating that no local marketing content exists.” Hence, the cited art fails to teach “determining whether a message indicating that no local marketing content exists for the television program has been received,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim.
Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 3

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 3 also recites “determining whether the local marketing content is add-on marketing.” The Examiner alleges *Roth* paragraphs [0007] and [0015] teach these limitations stating “local TV station can determine and substitute a local commercial signal in place of a national commercial signal.” OA p.3. Though it is difficult to tell, it appears the Examiner is interpreting a local commercial signal as meeting the claim’s “local marketing content.” The Examiner does not state which teaching of *Roth* is being interpreted as meeting the claim’s “add-on marketing.” *Id.* *Roth* is silent to determining whether it’s local commercial signals are “add-on” commercial signals. Hence, the cited art fails to teach “determining whether the local marketing content is add-on marketing,” as set forth in the claim.

Claim 3 also recites “adding the add-on marketing into the television program without modifying the substance of original marketing.” The Examiner alleges *Roth* paragraphs [0007] and [0015] teach these limitations and, though it is not stated, appears to interpret *Roth*’s “existing commercial signals” and “alternate commercial signals” as meeting the claim’s “original marketing” and “add-on marketing.” See OA p.3. *Roth* teaches “local substitution of alternate commercial signals in place of existing commercial signals within a television broadcast signal. E.g., *Roth* para. [0047]. As such, *Roth*’s local substitution modifies the existing commercial signal by substituting the original commercial with the alternate commercial. *Roth* is silent to adding an alternate commercial without modifying the original commercial. Hence, *Roth* fails to teach “adding the add-on marketing into the television program without modifying the substance of original marketing,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 4

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 4 also recites “determining whether the local marketing content is replacement marketing.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s alternate commercials as meeting the claim’s “local marketing content,” yet does not state which teaching of *Roth* is being interpreted as meeting the claim’s “replacement marketing.” See OA pp.3-4. The cited portions of *Roth* are silent to determining whether its alternate commercials are “replacement marketing.” Hence, the cited art fails to teach “determining whether the local marketing content is replacement marketing,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 5

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 5 also recites “determining whether the local marketing content is overlay marketing.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s alternate commercials as meeting the claim’s “local marketing content,” yet does not state which teaching of *Roth* is being interpreted as meeting the claim’s “overlay marketing.” See OA p.4. The cited portions of *Roth* are silent to determining whether its alternate commercials are “overlay marketing.” Hence, the cited art fails to teach “determining whether the local marketing content is overlay marketing,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Independent Claim 6

Claim 6 recites “a user ID and a program ID.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations. OA p.4. Applicant notes the cited portions of *Roth* are silent to both a user ID and a program ID. Hence, *Roth* fails to teach “a user ID and a program ID,” as set forth in the claim.

Claim 6 recites “determining the location of a user.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations stating “determining the commercial that specific television sets within its region or governing TV set in the region.” OA p.4. Applicant notes the cited portions of *Roth* are silent to determining a location of a user. Hence, *Roth* fails to teach “determining the location of a user,” as set forth in the claim.

Claim 6 recites “a television program.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations. OA p.4. Though it is difficult to tell from the OA, it appears the Examiner is interpreting *Roth*’s television broadcast signal as

meeting the claim's "television program." Applicant respectfully disagrees with this interpretation, noting that a "broadcast signal" is not a "program." Hence, *Roth* does not teach "a television program," as set forth in the claims.

Claim 6 also recites "determining whether a local marketing content exists for the television program based on the program ID." Though it is difficult to tell, the Examiner appears to interpret *Roth*'s television broadcast signal as meeting the claim's program ID (which, does not concede as discussed above). See OA p.4. Even if, *arguendo*, such an interpretation were correct, *Roth* is silent to using its television broadcast signal as a basis for "determining whether a local marketing content exists." Hence, the cited art fails to teach "determining whether a local marketing content exists for the television program based on the program ID," as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 8

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 8 also recites "a user profile." The Examiner does not state which, if any, portion of *Roth* teaches these limitations. The cited portions of *Roth* are silent to a "profile," much less a "user profile." Hence, the cited art fails to teach "a user profile," as set forth in the claim.

Dependent Claims 7 and 9-11

Claims 7 and 9-11 each depend from and inherit all the limitations of claim 6. As discussed above, claim 6 contains features and limitations that are not taught by the cited art. Thus, claims 7 and 9-11 each contain features and limitations that are not taught by the cited art. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Independent Claim 12

Claim 12 recites “a television program.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraphs [0047]-[0048] teach these limitations. OA pp.2 & 5 (relying on the reasoning used to reject claim 1). Though it is difficult to tell from the OA, it appears the Examiner is interpreting *Roth*’s television broadcast signal as meeting the claim’s “television program.” Applicant respectfully disagrees with this interpretation, noting that a “broadcast signal” is not a “program.” Hence, *Roth* does not teach “a television program,” as set forth in the claims.

Claim 12 also recites “a user ID and a program ID.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations stating “determining the commercial that specific television sets within its region or governing TV set in the region.” OA pp.2 & 5 (relying on the reasoning used to reject claim 1). Applicant notes the cited portions of *Roth* are silent to both a user ID and a program ID. Hence, *Roth* fails to teach “a user ID and a program ID,” as set forth in the claim.

Claim 12 also recites “sending a user ID and a program ID to the service provider.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s teachings of a local broadcasting station or a national broadcaster—embodied by *Roth* as upstream system 60 (*Roth* para. [0046])—as meeting the claim’s limitations of “a service provider.” See OA pp.2 & 5 (relying on the reasoning used to reject claim 1). It also appears that the Examiner is interpreting *Roth*’s television broadcast signal as meeting the claim’s user ID and program ID, with which Applicant disagrees, as discussed above. Applicant notes that *Roth* is silent sending its television broadcast signal to its upstream system 60. *Roth* teaches upstream system 60 sends the television broadcast signal to downstream converter 80. Hence, even when using the Examiner’s interpretation of *Roth*, the cited art fails to teach the limitations of “sending a user ID and a program ID to the service provider,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim.

Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 13

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 13 also recites “determining whether a message indicating that no local marketing content exists for the television program has been received.” The Examiner alleges *Roth* paragraph [0046] teaches these limitations. But the Examiner does not state what part of *Roth* is being interpreted as meeting the claim’s “message.” *See* OA pp. 3 & 5 (relying on the reasoning used to reject claims 1-11). Applicant notes the cited portions of *Roth* are silent to a “message,” much less “a message indicating that no local marketing content exists.” Hence, the cited art fails to teach “determining whether a message indicating that no local marketing content exists for the television program has been received,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim.

Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 14

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 14 also recites “determining whether the local marketing content is add-on marketing.” The Examiner alleges *Roth* paragraphs [0007] and [0015] teach these limitations stating “local TV station can determine and substitute a local commercial signal in place of a national commercial signal.” OA pp. 3 & 5 (relying on the reasoning used to reject claims 1-11). Though it is difficult to tell, it appears the Examiner is interpreting a local commercial signal as meeting the claim’s “local marketing content.” The Examiner does not state which teaching of *Roth* is being interpreted as meeting the claim’s “add-on marketing.” *Id.* *Roth* is silent in regard to determining whether it’s local commercial signals are “add-on” commercial signals. Hence, the cited art fails to teach “determining whether the

local marketing content is add-on marketing,” as set forth in the claim.

Claim 14 also recites “adding the add-on marketing into the television program without modifying the substance of original marketing.” The Examiner alleges *Roth* paragraphs [0007] and [0015] teach these limitations and, though it is not stated, appears to interpret *Roth*’s “existing commercial signals” and “alternate commercial signals” as meeting the claim’s “original marketing” and “add-on marketing.” See OA pp. 3 & 5 (relying on the reasoning used to reject claims 1-11). *Roth* teaches “local substitution of alternate commercial signals in place of existing commercial signals within a television broadcast signal. *E.g.*, *Roth* para. [0047]. As such, *Roth*’s local substitution modifies the existing commercial signal by substituting the original commercial with the alternate commercial. *Roth* is silent to adding an alternate commercial without modifying the original commercial. Hence, *Roth* fails to teach “adding the add-on marketing into the television program without modifying the substance of original marketing,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 15

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 15 also recites “determining whether the local marketing content is replacement marketing.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s alternate commercials as meeting the claim’s “local marketing content,” yet does not state which teaching of *Roth* is being interpreted as meeting the claim’s “replacement marketing.” See OA pp.3-5 (relying on the reasoning used to reject claims 1-11). The cited portions of *Roth* are silent to determining whether its alternate commercials are “replacement marketing.” Hence, the cited art fails to teach “determining whether the local marketing content is replacement marketing,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim.
Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 16

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 16 also recites “determining whether the local marketing content is overlay marketing.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s alternate commercials as meeting the claim’s “local marketing content,” yet does not state which teaching of *Roth* is being interpreted as meeting the claim’s “overlay marketing.” See OA p.4-5 (relying on the reasoning used to reject claims 1-11). The cited portions of *Roth* are silent to determining whether its alternate commercials are “overlay marketing.” Hence, the cited art fails to teach “determining whether the local marketing content is overlay marketing,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim.
Therefore, Applicant respectfully requests that the rejection be withdrawn.

Independent Claim 17

Claim 17 recites “a user ID and a program ID.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations. OA pp. 4-5 (relying on the reasoning used to reject claim 6). Applicant notes the cited portions of *Roth* are silent to both a user ID and a program ID. Hence, *Roth* fails to teach “a user ID and a program ID,” as set forth in the claim.

Claim 17 recites “determining the location of a user.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations stating “determining the commercial that specific television sets within its region or governing TV set in the region.” OA pp. 4-5 (relying on the reasoning used to reject claim 6). Applicant notes the cited portions of *Roth* are silent to determining a location of a user. Hence, *Roth* fails to teach

“determining the location of a user,” as set forth in the claim.

Claim 17 recites “a television program.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations. OA pp. 4-5 (relying on the reasoning used to reject claim 6). Though it is difficult to tell from the OA, it appears the Examiner is interpreting *Roth*’s television broadcast signal as meeting the claim’s “television program.” Applicant respectfully disagrees with this interpretation, noting that a “broadcast signal” is not a “program.” Hence, *Roth* does not teach “a television program,” as set forth in the claims.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Dependent Claim 19

In addition to the features inherited from its base and any intervening claims that are not taught by the cited art, as discussed above, claim 19 also recites “a user profile.” The Examiner does not state which, if any, portion of *Roth* teaches these limitations. See OA p.5 (relying on the reasoning used to reject claim 8). The cited portions of *Roth* are silent regarding a “profile,” much less a “user profile.” Hence, the cited art fails to teach “a user profile,” as set forth in the claim.

Dependent Claims 18 and 20-22

Claims 18 and 20-22 each depend from and inherit all the limitations of claim 17. As discussed above, claim 17 contains features and limitations that are not taught by the cited art. Thus, claims 18 and 20-22 each contain features and limitations that are not taught by the cited art. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Independent Claim 23

Claim 23 recites “a television program.” The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraphs [0047]-[0048] teach these limitations. OA pp. 2 & 5

(relying on the reasoning used to reject claims 1-11). Though it is difficult to tell from the OA, it appears the Examiner is interpreting *Roth*'s television broadcast signal as meeting the claim's "television program." Applicant respectfully disagrees with this interpretation, noting that a "broadcast signal" is not a "program." Hence, *Roth* does not teach "a television program," as set forth in the claims.

Claim 23 also recites "a user ID and a program ID." The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations stating "determining the commercial that specific television sets within its region or governing TV set in the region." OA pp. 2 & 5 (relying on the reasoning used to reject claims 1-11). Applicant notes the cited portions of *Roth* are silent to both a user ID and a program ID. Hence, *Roth* fails to teach "a user ID and a program ID," as set forth in the claim.

Claim 23 also recites "sending a user ID and a program ID to the service provider." Though it is difficult to tell, the Examiner appears to interpret *Roth*'s teachings of a local broadcasting station or a national broadcaster—embodied by *Roth* as upstream system 60 (*Roth* para. [0046])—as meeting the claim's limitations of "a service provider." See OA pp.2 & 5 (relying on the reasoning used to reject claim 1). It also appears that the Examiner is interpreting *Roth*'s television broadcast signal as meeting the claim's user ID and program ID, with which Applicant disagrees, as discussed above. Applicant notes that *Roth* is silent sending its television broadcast signal to its upstream system 60. *Roth* teaches upstream system 60 sends the television broadcast signal to downstream converter 80. Hence, even when using the Examiner's interpretation of *Roth*, the cited art fails to teach the limitations of "sending a user ID and a program ID to the service provider," as set forth in the claim.

Claim 23 also recites "determining the location of a user." The cited art fails to teach these limitations. The Examiner alleges *Roth* paragraph [0046] teaches these limitations stating "determining the commercial that specific television sets within its region or governing TV set in

the region.” OA pp. 4-5 (relying on the reasoning used to reject claims 1-11). Applicant notes the cited portions of *Roth* are silent to determining a location of a user. Hence, *Roth* fails to teach “determining the location of a user,” as set forth in the claim.

Claim 23 also recites “determining whether a local marketing content exists for the television program based on the program ID.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s television broadcast signal as meeting the claim’s program ID (which Applicant does not concede, as discussed above). See OA p.5 (relying on the reasoning used to reject claims 1-11). Even if, *arguendo*, such an interpretation were correct, *Roth* is silent to using its television broadcast signal as a basis for “determining whether a local marketing content exists.” Hence, the cited art fails to teach “determining whether a local marketing content exists for the television program based on the program ID,” as set forth in the claim.

Claim 23 also recites “determining whether a message indicating that no local marketing content exists for the television program has been received.” The Examiner alleges *Roth* paragraph [0046] teaches these limitations. But the Examiner does not state what part of *Roth* is being interpreted as meeting the claim’s “message.” See OA p.5 (relying on the reasoning used to reject claims 1-11). Applicant notes the cited portions of *Roth* are silent to a “message,” much less “a message indicating that no local marketing content exists.” Hence, the cited art fails to teach “determining whether a message indicating that no local marketing content exists for the television program has been received,” as set forth in the claim.

Claim 23 also recites “determining whether the local marketing content is add-on marketing.” The Examiner alleges *Roth* paragraphs [0007] and [0015] teach these limitations stating “local TV station can determine and substitute a local commercial signal in place of a national commercial signal.” OA pp. 3 & 5 (relying on the reasoning used to reject claims 1-11, specifically, claim 3). Though it is difficult to tell, it appears the Examiner is interpreting a local commercial signal as meeting the claim’s “local marketing content.” The Examiner does not

state which teaching of *Roth* is being interpreted as meeting the claim's "add-on marketing." *Id.* *Roth* is silent to determining whether it's local commercial signals are "add-on" commercial signals. Hence, the cited art fails to teach "determining whether the local marketing content is add-on marketing," as set forth in the claim.

Claim 23 also recites "adding the add-on marketing into the television program without modifying the substance of original marketing." The Examiner alleges *Roth* paragraphs [0007] and [0015] teach these limitations and, though it is not stated, appears to interpret *Roth*'s "existing commercial signals" and "alternate commercial signals" as meeting the claim's "original marketing" and "add-on marketing." See OA p.5 (relying on the reasoning used to reject claims 1-11). *Roth* teaches "local substitution of alternate commercial signals in place of existing commercial signals within a television broadcast signal. *E.g.*, *Roth* para. [0047]. As such, *Roth*'s local substitution modifies the existing commercial signal by substituting the original commercial with the alternate commercial. *Roth* is silent to adding an alternate commercial without modifying the original commercial. Hence, *Roth* fails to teach "adding the add-on marketing into the television program without modifying the substance of original marketing," as set forth in the claim.

Claim 23 also recites "determining whether the local marketing content is replacement marketing." Though it is difficult to tell, the Examiner appears to interpret *Roth*'s alternate commercials as meeting the claim's "local marketing content," yet does not state which teaching of *Roth* is being interpreted as meeting the claim's "replacement marketing." See OA p.5 (relying on the reasoning used to reject claims 1-11). The cited portions of *Roth* are silent to determining whether its alternate commercials are "replacement marketing." Hence, the cited art fails to teach "determining whether the local marketing content is replacement marketing," as set forth in the claim.

Claim 23 also recites "determining whether the local marketing content is overlay

marketing.” Though it is difficult to tell, the Examiner appears to interpret *Roth*’s alternate commercials as meeting the claim’s “local marketing content,” yet does not state which teaching of *Roth* is being interpreted as meeting the claim’s “overlay marketing.” See OA p.5 (relying on the reasoning used to reject claims 1-11). The cited portions of *Roth* are silent to determining whether its alternate commercials are “overlay marketing.” Hence, the cited art fails to teach “determining whether the local marketing content is overlay marketing,” as set forth in the claim.

Claim 23 also recites “a user profile.” The Examiner does not state which, if any, portion of *Roth* teaches these limitations. The cited portions of *Roth* are silent to a “profile,” much less a “user profile.” Hence, the cited art fails to teach “a user profile,” as set forth in the claim.

Thus, the cited art fails to teach each and every element as set forth in the claim. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Conclusion

3. For the foregoing reasons, applicant submits that the claims are now in condition for allowance.

Respectfully submitted,



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